

**BellSouth**  
Suite 900  
1133-21st Street, N.W.  
Washington, D.C. 20036-3351

kathleen.levitz@bellsouth.com

June 20, 2000

EX PARTE

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
The Portals  
445 12<sup>th</sup> St. SW  
Washington, D.C. 20554

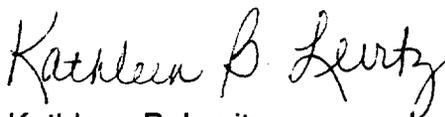
Re: CC Docket No. 98-56 and CC Docket No. 98-121

Dear Ms. Salas:

This is to inform you that on June 20, 2000 Bill Stacy, Bob Blau, Jonathan Banks, and I, representing BellSouth, met with members of the Commission's Common Carrier to discuss the status of the Third Party Testing program that KPMG is now conducting under the supervision of the Georgia Public Service Commission. The following Commission staff participated in the discussion: Jake Jennings; Kathy Farroba; Claudia Fox; Eric Einhorn; and Daniel Shiman of the Common Carrier Bureau's Policy and Program Planning Division. The attached documents formed the basis for our discussion.

Because the Commission has been considering issues related to performance measurements and standards in both proceedings identified above, we are filing notice of this ex parte meeting in both dockets, as required by Section 1.1206(b)(2) of the Commission's rules. Please associate this notice with the record of both dockets.

Sincerely,



Kathleen B. Levitz

Attachments

cc: Jake Jennings (w/o attachments)  
Kathy Farroba (w/o attachments)  
Claudia Fox (w/o attachments)  
Eric Einhorn (w/o attachments)  
Daniel Shiman (w/o attachments)

Kathleen B. Levitz  
Vice President-Federal Regulatory

202 463-4113  
Fax 202 463-4198

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY



**BellSouth-GA OSS Testing Evaluation  
Interim Status Report  
June 9, 2000**

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## **1.0 Document Objective**

In this document, KPMG provides an interim summary status report on developments related to the BellSouth-GA OSS Test. A brief overview of key developments is provided in section 2.0. Key upcoming activities are summarized in section 3.0. A more detailed report on specific Master Test Plan (MTP) items is provided in the table in section 4.0. Each item presented in the table in section 4.0 includes a reference number that identifies the item from a previous status report, where applicable. A more detailed report on specific Supplemental Test Plan (STP) items is provided in the table in section 5.0. Each item presented in the table in section 5.0 includes a reference number that identifies the item from a previous status report, where applicable. A more detailed report on Exceptions is provided in the table in section 6.0.

## **2.0 Key Developments**

- Pre-order and order testing:
  - KPMG remains at approximately 85% completion of planned orders for EDI and TAG functional testing and at approximately 95% completion of pre-orders via TAG. As BellSouth resolves issues and exceptions, KPMG will submit the remainder of the outstanding orders and pre-orders.
  - KPMG is conducting a pre-order timeliness re-test. Current results indicate that the majority of responses are being returned within proposed timeframes.
- Pre-order and order volume testing:
  - KPMG is continuing to submit data requests and interviews with BellSouth personnel in order to complete its comparison of the hardware, applications and data loads in the production and RSIMMS (volume test) environments.
- Performance measurement reporting (Metrics):
  - KPMG has substantially completed the process of replicating the calculations of SQMs for the KPMG test CLEC, as applicable, for the month of April 2000. KPMG had previously completed the process of replicating the calculations for November 1999 through March 2000. Additionally, KPMG has substantially completed the process of replicating the calculations of SQMs for the CLEC aggregate where BellSouth does not report on a CLEC-specific basis.
  - KPMG has substantially completed the process of comparing KPMG Test CLEC-collected data by KPMG to that provided by BellSouth (PMAP raw data), through the month of March.



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- KPMG continues to discuss replication and data comparison issues via the exceptions process.
- KPMG has completed the process of replicating the calculations of SQMs for the CLEC aggregate and BellSouth retail for October 1999 and other selected months. KPMG has issued exceptions related to these reports and is discussing them with BellSouth.
- KPMG has finished comparing BellSouth data from the early stages of processing to BellSouth raw data for PMAP SQMs and manual SQMs. KPMG has issued exceptions related to these data and is discussing them with BellSouth.
- KPMG has reviewed BellSouth's data collection and storage processes, and metrics-related change management processes. KPMG has issued exceptions related to these processes and is discussing them with BellSouth.
- KPMG has completed its review of BellSouth's definitions of performance measures and its comparison of BellSouth calculation descriptions with actual BellSouth computation procedures. KPMG has issued exceptions related to these comparisons and is discussing them with BellSouth.
- Maintenance and Repair:
  - KPMG has completed approximately 95% of M&R 12: TAFI Functional Test of Resale Lines. Testing continues on BLS responses to exceptions identified during the original test. Analysis and report writing are currently underway.
  - KPMG has completed approximately 85% of M&R 13: ECTA Functional Test of Resale Lines. Testing continues on BLS responses to exceptions identified during the original test. Testing is still required on Synchronet lines which, are not yet accessible to the ECTA testing team. These lines are expected to be available during the week of June 12 or June 19, 2000.
  - KPMG is currently awaiting the provisioning of xDSL capable UNE Loops in order to begin the fault insertion testing of M&R 11: Maintenance and Repair End-To-End Process Evaluation of xDSL Capable UNE Loops. Fault insertion is expected to begin during the week of June 12, 2000.
- Billing:
  - KPMG placed UNE DUF calls during the week of April 24, 2000 as part of re-testing activities associated with Exceptions 27, 28, and 29. Analysis of the DUF files will be completed on June 7, 2000.



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- KPMG completed its analysis of the Resale DUF test. A Draft Exception has been issued and KPMG is awaiting BLS's response.
- Performance measures and standards:
  - The Georgia Public Service Commission approved a set of measures and corresponding standards for use in the test on June 6, 2000. KPMG is currently evaluating these standards to determine our ability to map test results to this framework.

### **3.0 Key Upcoming Activities**

- KPMG expects to file the next interim status report during the week of July 10, 2000.



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**4.0 Master Test Plan Specific Item Status**

Ref <sup>1</sup>	Item	Status	Issues	Next Step/Resolution
I-6	EDI functional testing	<ul style="list-style-type: none"> <li>KPMG issued the following exceptions that remain open: Exceptions 4, 9, 18, 22, 26, 31, 32, 38, 39, 44, 47, 51, 54, 60, 67, 68, 69, 72, 77 &amp; 78. Additionally, KPMG has submitted one draft exception to BLS that will be publicly issued if the information is substantiated by the BLS response.</li> </ul>	<ul style="list-style-type: none"> <li>The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>.</li> </ul>	<ul style="list-style-type: none"> <li>All exceptions must be closed for purposes of the test before reports can be finalized.</li> </ul>
		<ul style="list-style-type: none"> <li>KPMG is proceeding with EDI functional testing for all UNE product types. Approximately 85% of planned orders have been submitted.</li> </ul>	<ul style="list-style-type: none"> <li>None</li> </ul>	<ul style="list-style-type: none"> <li>N/A.</li> </ul>
			<ul style="list-style-type: none"> <li>The following issue presented in the 4/06/00 interim status report remains open: A timeliness deficiency in BLS's delivery of fully-mechanized Clarifications (CLRs);</li> </ul>	<ul style="list-style-type: none"> <li>BLS is in the process of investigating and resolving this issue. KPMG anticipates a BLS response to this issue by 6/9/2000. KPMG will re-test as appropriate.</li> </ul>
			<ul style="list-style-type: none"> <li>The following issue presented in the 3/03/00 interim status report remains open: 1) Due Dates (DD) returned on a service request confirmation are not meeting KPMG's Desired Due Date (DDD).</li> </ul>	<ul style="list-style-type: none"> <li>BLS is in the process of investigating and resolving this issue. KPMG will re-test, as appropriate.</li> </ul>

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Ref <sup>1</sup>	Item	Status	Issues	Next Step/Resolution
		<ul style="list-style-type: none"> <li>In response to an issue identified regarding inadequate process definition for delivering electronic Jeopardy and Missed Appointment (MA) Notifications, BLS is modifying its existing documentation. Based on the refined definition of Jeopardy and MA Notification delivery, KPMG is reviewing previously-defined issues surrounding timeliness of Jeopardy and MA Notification delivery.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG will review the revised <i>Pending Order Status Job Aid</i> documentation upon publication, scheduled for 6/30/00.</li> </ul>
		<ul style="list-style-type: none"> <li>BLS is proposing additions to existing electronic ordering functionality in response to several issues raised by KPMG: 1) The absence of system functionality to process UNE-to-UNE service requests; and 2) The absence of system functionality to process UNE Loop partial migrations; and 3) The receipt of faxed responses to electronically-submitted LNP service requests.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>BLS has issued defect or feature implementation change requests to address these issues. They are scheduled for discussion and implementation prioritization at the June Change Control Meeting.</li> </ul>
		<ul style="list-style-type: none"> <li>In response to a timeliness deficiency in BLS's delivery of Functional Acknowledgements (FAs) via EDI, BLS is implementing a process change within its EDI translator to segregate incoming CLEC transactions from those of other trading partners. This process change is scheduled to complete on June 9, 2000.</li> </ul>	<ul style="list-style-type: none"> <li>While this process change may affect the timeliness of FA delivery, BLS acknowledges that significant improvements are not likely to be realized until EDI hardware and software upgrades are instituted. This project is scheduled for completion in December 2000.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG will test the effects of the CLEC-segregated EDI translator environment on FA delivery timeliness.</li> </ul>
		<ul style="list-style-type: none"> <li>In response to an issue regarding the receipt of erroneous or inaccurate service order responses generated by BLS representatives, BLS has conducted re-training for its LCSC ordering representatives.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG is conducting a re-test of this issue.</li> </ul>

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Ref <sup>1</sup>	Item	Status	Issues	Next Step/Resolution
		<ul style="list-style-type: none"> <li>In response to a constraint with respect to ordering Directory Listings (DL) with UNE Loops service requests on the same service order, BLS has responded that it is not operationally feasible to implement DL and LS orders on a single service request. CLECs are instructed to utilize the Related Purchase Order Number (RPON) function to relate two distinct service orders or to simply issue two unrelated service orders and request the same due date on both.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG continued to encounter ordering difficulties when issuing separate LS and DL service requests, notably when addressing supplements.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG will issue an amended version of Exception 31 to highlight these continued ordering difficulties.</li> </ul>
		<ul style="list-style-type: none"> <li>In response to an issue regarding missing or extraneous data elements and data values on service order responses (FOCs and CNs), BLS will update its existing documentation to more accurately reflect the expected components of order responses.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG will review the revised LEO Implementation Guide, Volume 1 upon publication.</li> </ul>
		<ul style="list-style-type: none"> <li>On 4/29/00, BLS implemented a system fix to support the migration of a customer's Billing Telephone Number (BTN) on Loop-Port Combination service requests. Carrier Notification SN91081797 was posted to the BLS Interconnection Web-site on 5/25/00. KPMG submitted Loop-Port Combination partial migration service requests via TAG and EDI and received Firm Order Confirmations (FOCs).</li> </ul>	<ul style="list-style-type: none"> <li>None</li> </ul>	<ul style="list-style-type: none"> <li>KPMG is drafting a closure statement to Exception 51.</li> </ul>



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		<ul style="list-style-type: none"><li>In response to an issue regarding the potential lack of BLS system order validation on UNE port and port-loop combination service requests with an LPIC of 5124, BLS has indicated that the new Port-Loop Combination service offering (available as of 3/17/00) does allow a 5124 LPIC.</li></ul>	<ul style="list-style-type: none"><li>None.</li></ul>	<ul style="list-style-type: none"><li>KPMG and BLS will continue to investigate potential order validation deficiencies with respect to LPIC requests for UNE Ports.</li></ul>
		<ul style="list-style-type: none"><li>In response to an issue identified regarding timely delivery of Completion Notifications, BLS has been unable to investigate the root cause for the late responses, due to the fact that system response detail was purged following routine procedures.</li></ul>	<ul style="list-style-type: none"><li>None.</li></ul>	<ul style="list-style-type: none"><li>KPMG will provide BLS with test bed requirements for the CN timeliness retest. KPMG is in the process of planning a retest designed to evaluate current CN delivery timeliness and to provide BLS with current data on any late responses received.</li></ul>
		<ul style="list-style-type: none"><li>In response to an issue identified regarding the absence of adequate documentation on the BLS process for returning Status messages on confirmed service requests, BLS has provided reference to several documents issued via the Change Control process. BLS is also updating its <i>Pending Order Status Job Aid</i> to more clearly define the process for returning status messages.</li></ul>	<ul style="list-style-type: none"><li>None.</li></ul>	<ul style="list-style-type: none"><li>KPMG will review the updated documentation upon publication, scheduled for 6/30/00.</li></ul>
		<ul style="list-style-type: none"><li>In response to an issue identified in submitting TN changes in association with Outside Move service requests, BLS has provided amended business rules. These rules have been added to the latest release of BLS business rules for ordering (<i>Local Exchange Ordering Guide, Volume 1, Issue 7P</i>).</li></ul>	<ul style="list-style-type: none"><li>None.</li></ul>	<ul style="list-style-type: none"><li>N/A.</li></ul>
		<ul style="list-style-type: none"><li>BLS informed KPMG that ISDN-to-UNE and CENTREX-to-UNE migrations are not supported for any service delivery method.</li></ul>	<ul style="list-style-type: none"><li>KPMG has received multiple conflicting responses to inquiries on these conversion types. BLS documentation does not adequately specify the types of electronically orderable service requests that are supported.</li></ul>	<ul style="list-style-type: none"><li>KPMG submitted a draft exception regarding BLS's documentation.</li></ul>



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Ref <sup>1</sup>	Item	Status	Issues	Next Step/Resolution
I-7	TAG functional testing	<ul style="list-style-type: none"> <li>KPMG issued the following exceptions that remain open: Exceptions 4, 9, 18, 22, 26, 31, 32, 38, 39, 40, 44, 47, 51, 54, 67, 68, 69, 72, 77 &amp; 78. Additionally, KPMG has submitted one draft exception to BLS that will be publicly issued if the information is substantiated by the BLS response.</li> </ul>	<ul style="list-style-type: none"> <li>The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>.</li> </ul>	<ul style="list-style-type: none"> <li>All exceptions must be closed for purposes of the test before reports can be finalized.</li> </ul>
		<ul style="list-style-type: none"> <li>KPMG is proceeding with TAG functional testing for all UNE product types. Approximately 85% of planned orders have been submitted.</li> </ul>	<ul style="list-style-type: none"> <li>None</li> </ul>	<ul style="list-style-type: none"> <li>N/A.</li> </ul>
			<ul style="list-style-type: none"> <li>The following issue presented in the 4/06/00 interim status report remains open: A timeliness deficiency in BLS's delivery of fully-mechanized Clarifications (CLRs);</li> </ul>	<ul style="list-style-type: none"> <li>BLS is in the process of investigating and resolving this issue. KPMG expects a response to this issue by June 9, 2000. KPMG will re-test, as appropriate.</li> </ul>
			<ul style="list-style-type: none"> <li>The following issue presented in the 3/03/00 interim status report remains open: 1) Due Dates (DD) returned on a service request confirmation are not meeting KPMG's Desired Due Date (DDD)</li> </ul>	<ul style="list-style-type: none"> <li>BLS is in the process of investigating and resolving this issue. KPMG will re-test, as appropriate.</li> </ul>
	<ul style="list-style-type: none"> <li>In response to a TAG system problem with processing coordinated hot cut requests (with CHC field = Y and DFDT field blank) on non-designed (SL1) loop service requests, BLS indicated that this issue was corrected in a later version of TAG. KPMG successfully re-tested this order type in TAG version 2.2.0.8.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>N/A.</li> </ul>	



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Ref <sup>1</sup>	Item	Status	Issues	Next Step/Resolution
		<ul style="list-style-type: none"><li>In response to an issue identified regarding inadequate process definition for delivering electronic Jeopardy and Missed Appointment (MA) Notifications, BLS is modifying its existing documentation. Based on the refined definition of Jeopardy and MA Notification delivery, KPMG is reviewing previously-defined issues surrounding timeliness of Jeopardy and MA Notification delivery.</li></ul>	<ul style="list-style-type: none"><li>None.</li></ul>	<ul style="list-style-type: none"><li>KPMG will review the revised <i>Pending Order Status Job Aid</i> documentation upon publication, scheduled for 6/30/00.</li></ul>
		<ul style="list-style-type: none"><li>BLS is proposing additions to existing electronic ordering functionality in response to several issues raised by KPMG: 1) The absence of system functionality to process UNE-to-UNE service requests; and 2) The absence of system functionality to process UNE Loop partial migrations; and 3) The receipt of faxed responses to electronically-submitted LNP service requests.</li></ul>	<ul style="list-style-type: none"><li>None.</li></ul>	<ul style="list-style-type: none"><li>BLS has issued defect or feature implementation change requests to address these issues. They are scheduled for discussion and implementation prioritization at the June Change Control Meeting.</li></ul>
		<ul style="list-style-type: none"><li>In response to an issue regarding the receipt of erroneous or inaccurate service order responses generated by BLS representatives, BLS has conducted re-training for its LCSC ordering representatives.</li></ul>	<ul style="list-style-type: none"><li>KPMG continued to received inaccurate Clarifications following Rep re-training.</li></ul>	<ul style="list-style-type: none"><li>BLS and KPMG continue to investigate and resolve this issue.</li></ul>



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		<ul style="list-style-type: none"><li>In response to a constraint with respect to ordering Directory Listings (DL) with UNE Loops service requests on the same service order, BLS has responded that it is not operationally feasible to implement DL and LS orders on a single service request. CLECs are instructed to utilize the Related Purchase Order Number (RPON) function to relate two distinct service orders or to simply issue two unrelated service orders and request the same due date on both.</li></ul>	<ul style="list-style-type: none"><li>KPMG continued to encounter ordering difficulties when issuing separate LS and DL service requests, notably when addressing supplements.</li></ul>	<ul style="list-style-type: none"><li>KPMG will issue an amended version of Exception 31 to highlight these continued ordering difficulties.</li></ul>
		<ul style="list-style-type: none"><li>In response to an issue regarding missing or extraneous data elements and data values on service order responses (FOCs and CNs), BLS will update its existing documentation to more accurately reflect the expected components of order responses.</li></ul>	<ul style="list-style-type: none"><li>None.</li></ul>	<ul style="list-style-type: none"><li>KPMG will review the revised LEO Implementation Guide, Volume 1 upon publication.</li></ul>
		<ul style="list-style-type: none"><li>On 4/29/00, BLS implemented a system fix to support the migration of a customer's Billing Telephone Number (BTN) on Loop-Port Combination service requests. Carrier Notification SN91081797 was posted to the BLS Interconnection Web-site on 5/25/00. KPMG submitted Loop-Port Combination partial migration service requests via TAG and EDI and received Firm Order Confirmations (FOCs).</li></ul>	<ul style="list-style-type: none"><li>None.</li></ul>	<ul style="list-style-type: none"><li>KPMG is drafting a closure statement for Exception 51.</li></ul>
		<ul style="list-style-type: none"><li>In response to an issue regarding the potential lack of BLS system order validation on UNE port and port-loop combination service requests with an LPIC of 5124, BLS has indicated that the new Port-Loop Combination service offering (available as of 3/17/00) does allow a 5124 LPIC.</li></ul>	<ul style="list-style-type: none"><li>None.</li></ul>	<ul style="list-style-type: none"><li>KPMG and BLS will continue to investigate potential order validation deficiencies with respect to LPIC requests for UNE Ports.</li></ul>



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Ref <sup>1</sup>	Item	Status	Issues	Next Step/Resolution
		<ul style="list-style-type: none"><li>In response to an issue identified regarding timely delivery of Completion Notifications, BLS has been unable to investigate the root cause for the late responses, due to the fact that system response detail was purged following routine procedures.</li></ul>	<ul style="list-style-type: none"><li>None.</li></ul>	<ul style="list-style-type: none"><li>KPMG is in the process of planning a retest designed to evaluate current CN delivery timeliness and to provide BLS with current data on any late responses received. KPMG will provide BLS with test bed requirements for the CN timeliness retest.</li></ul>
		<ul style="list-style-type: none"><li>In response to an issue identified regarding the absence of adequate documentation on the BLS process for returning Status messages on confirmed service requests, BLS has provided reference to several documents issued via the Change Control process. BLS is also updating its <i>Pending Order Status Job Aid</i> to more clearly define the process for returning status messages.</li></ul>	<ul style="list-style-type: none"><li>None.</li></ul>	<ul style="list-style-type: none"><li>KPMG will review the updated documentation upon publication, scheduled for 6/30/00.</li></ul>
		<ul style="list-style-type: none"><li>In response to an issue regarding submission of TN changes in association with Outside Move service requests, BLS has provided amended business rules. These rules have been added to the latest release of BLS business rules for ordering (<i>Local Exchange Ordering Guide, Volume 1, Issue 7P</i>).</li></ul>	<ul style="list-style-type: none"><li>None.</li></ul>	<ul style="list-style-type: none"><li>N/A.</li></ul>



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Ref <sup>1</sup>	Item	Status	Issues	Next Step/Resolution
	Pre-Order Functional Testing	<ul style="list-style-type: none"> <li>KPMG issued the following exceptions, related to Pre-Order functional testing, that remain open: Exceptions 1, 24, 65, 66 &amp; 71.</li> </ul>	<ul style="list-style-type: none"> <li>The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>.</li> </ul>	<ul style="list-style-type: none"> <li>All exceptions must be closed for purposes of the test before reports can be finalized.</li> </ul>
		<ul style="list-style-type: none"> <li>Approximately 95% of planned TAG pre-orders have been submitted.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG has uncovered discrepancies between the service establishment intervals obtained from BLS documentation (<i>Product and Services Interval Guide</i>) versus those obtained from the Calculate Due Date (CDD) pre-order query.</li> </ul>	<ul style="list-style-type: none"> <li>BLS is in the process of investigating and resolving these issues. KPMG will re-test, as appropriate.</li> </ul>
			<ul style="list-style-type: none"> <li>The following issues presented in the 4/06/00 interim status report remain open: 1) A system limitation in processing Calculate Due Date (CDD) queries for Loop with Number Portability migrations, Stand-Alone Number Portability migrations, and Loop-Port Combination service requests; 3) Missing or extraneous data elements and data values on pre-order responses.</li> </ul>	<ul style="list-style-type: none"> <li>BLS is in the process of investigating and resolving these issues. KPMG will re-test, as appropriate.</li> </ul>
			<ul style="list-style-type: none"> <li>The following issue presented in the 03/03/00 interim status report remains open: 1) BLS's pre-order business rules do not contain information on the inputs or outputs for Calculate Due Date (CDD) pre-order queries.</li> </ul>	<ul style="list-style-type: none"> <li>BLS published new pre-order business rules on 6/05/00. KPMG is currently re-test.</li> </ul>
I-8	CRIS/CABS Invoicing Functional Test	<ul style="list-style-type: none"> <li>KPMG issued the following exceptions, related to CRIS/CABS invoicing functional testing, that remain open: Exception 16, 35 &amp; 87.</li> </ul>	<ul style="list-style-type: none"> <li>The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>.</li> </ul>	<ul style="list-style-type: none"> <li>All exceptions must be closed for purposes of the test before reports can be finalized.</li> </ul>
II-1	Metrics	<ul style="list-style-type: none"> <li>KPMG issued the following exceptions, related to Metrics (Performance Measures Evaluations) that remain open: Exceptions 3, 19, 23, 42, 43, 45, 46, 52, 56, 61, 62, 64, 70, 74, 79, 83, 84, 86, 88, 89, 90, 91. Additionally, KPMG has submitted two draft exceptions to BLS that will be publicly issued if the information is substantiated by the BLS response.</li> </ul>	<ul style="list-style-type: none"> <li>The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>.</li> </ul>	<ul style="list-style-type: none"> <li>All exceptions must be closed for purposes of the test before reports can be finalized.</li> </ul>



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Ref <sup>1</sup>	Item	Status	Issues	Next Step/Resolution
		<ul style="list-style-type: none"> <li>KPMG has completed calculations of SQM values for the KPMG test CLEC for November through March. KPMG has also completed calculations of SQM values for the CLEC aggregate, for those SQMs not reported on a CLEC-specific basis.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG has found some discrepancies between the values KPMG calculated and values reported by BLS.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG has brought these to the attention of BLS via Draft Exceptions and Exceptions.</li> </ul>
		<ul style="list-style-type: none"> <li>KPMG is updating the calculation validation programs to apply to April SQM values for the KPMG CLEC.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG anticipates identifying issues, if any, within the next week.</li> </ul>	<ul style="list-style-type: none"> <li>If KPMG finds any discrepancies, KPMG will bring them to the attention of BLS via Draft Exceptions.</li> </ul>
		<ul style="list-style-type: none"> <li>KPMG continues to compare BLS raw data to KPMG CLEC data</li> </ul>	<ul style="list-style-type: none"> <li>KPMG has found some apparent discrepancies between the BLS raw data and the KPMG CLEC data.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG anticipates an Amended Response to Exception 56 shortly. Exceptions 42 and 43, described above, also relate to data comparison issues.</li> </ul>
II-4	Volume Test	<ul style="list-style-type: none"> <li>KPMG/HP successfully completed a system readiness test. KPMG/HP prepared all pre-order and order transactions for the volume test. KPMG/HP successfully completed the first Normal Volume Day.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG/HP expect to execute the second normal volume test in the RSIMMS environment shortly.</li> </ul>
		<ul style="list-style-type: none"> <li>KPMG/HP attempted to conduct the normal volume test in the RSIMMS environment on 4/26/00. KPMG/HP attempted to re-execute the normal volume test in the RSIMMS environment on 5/12/00.</li> </ul>	<ul style="list-style-type: none"> <li>Due to BLS system problems relating to LNP, the volume test on 4/26/00 was halted on the same day. Due to HP system problems, the volume test on 5/12/00 was halted on the same day.</li> </ul>	<ul style="list-style-type: none"> <li>To address these system problems, BLS implemented a new ANCHOR system update on 4/29/00.</li> </ul>
		<ul style="list-style-type: none"> <li>KPMG is performing an evaluation of the RSIMMS and production environments to verify that there are no significant differences in hardware, applications, and data loads.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG's requires additional information and clarification from BLS.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG met with BLS personnel in Birmingham on 5/09/00 to discuss questions posed by KPMG based on initial reviews of the system documentation provided by BLS. KPMG will review additional documentation requested from BLS.</li> </ul>



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Ref <sup>1</sup>	Item	Status	Issues	Next Step/Resolution
II-5	Change management	<ul style="list-style-type: none"> <li>KPMG issued the following exceptions, related to Change Management: Exceptions 2, 17 &amp; 30. Based on BLS's Interim Change Control Process, BLS corrected the specific KPMG-identified defects identified in Exceptions 2 and 30. KPMG received and is reviewing documentation from BLS that is intended to address issues identified in Exception 17.</li> </ul>	<ul style="list-style-type: none"> <li>The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG expects to recommend closure of Exceptions 2 and 30 to the GPSC.</li> </ul>
		<ul style="list-style-type: none"> <li>KPMG's monitoring of the <i>Interim Change Control Process (I-CCP)</i>, previously identified potential issues with BLS's handling of Type 6 Defect change requests, relative to procedures published in the <i>I-CCP</i> document. KPMG has conducted additional interviews with BLS personnel to further explore processes for Type 6 Defect change request handling. Following this additional discovery process, KPMG has determined that BLS's procedures for processing Type 6 Defect change requests align with those identified in the <i>I-CCP</i> document.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG will continue to monitor the BLS-CLEC use of the Interim Change Control Process for adherence to prescribed processes.</li> </ul>
III-1	Flow-Through Evaluation	<ul style="list-style-type: none"> <li>KPMG issued the following exceptions, related to Flow Through that remain open: Exceptions 21, 41 &amp; 48. KPMG has completed satisfactory re-testing of exceptions 21, 41 and 48.</li> </ul>	<ul style="list-style-type: none"> <li>The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>.</li> </ul>	<ul style="list-style-type: none"> <li>All exceptions must be closed for purposes of the test before reports can be finalized. KPMG expects to recommend closure of Exceptions 21 and 48 to the GPSC. KPMG is awaiting CLEC input regarding Exception 41.</li> </ul>
		<ul style="list-style-type: none"> <li>KPMG completed its review of questions raised during CLEC interviews related to documentation of the flow-through process and access to the flow-through report on the PMAP Web page.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>N/A.</li> </ul>



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		<ul style="list-style-type: none"> <li>KPMG completed its review of documentation and training regarding the process for determining the cause of LSR fallout (CLEC versus BLS causes).</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>N/A.</li> </ul>
III-2	CLEC Participation – Ordering	<ul style="list-style-type: none"> <li>KPMG is proceeding with UNE-LNP and CLEC-to-CLEC migration orders using CLEC-provided facilities.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG uncovered a potential BLS system limitation with performing CLEC-to-CLEC migrations.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG and BLS are continuing to investigate and resolve this issue.</li> </ul>
		<ul style="list-style-type: none"> <li>KPMG utilized CLEC-provided TNs to successfully submit Directory Listing (DL) and TN change service requests.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>N/A.</li> </ul>
		<ul style="list-style-type: none"> <li>KPMG did not receive Completion Notifications (CNs) for 15 LNP service requests for which the confirmed due date had passed. BLS reported that for a number of these requests, the TNs had not been ported. BLS does not issue a CN until the CLEC has ported all TNs associated with an LNP service request. KPMG forwarded the affected TNs to CLECs for further research.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG has not received responses from several CLECs.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG will follow up with CLEC contacts to determine next steps.</li> </ul>
III-3	Capacity Management	<ul style="list-style-type: none"> <li>KPMG has issued the following exception related to Capacity Management that remains open: Exception 25.</li> </ul>	<ul style="list-style-type: none"> <li>The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>.</li> </ul>	<ul style="list-style-type: none"> <li>All exceptions must be closed for purposes of the test before reports can be finalized.</li> </ul>
		<ul style="list-style-type: none"> <li>KPMG requested additional information and documentation for re-testing related to Exception 25. KPMG is evaluating previously received documentation.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG is awaiting receipt of additional documentation for pre-order transaction tracking.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG will continue to analyze documentation and process information collected during re-testing activities.</li> </ul>



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IV-1	TAFI functional testing	<ul style="list-style-type: none"> <li>KPMG issued the following exceptions related to TAFI functional testing which remain open: Exceptions 13, 14, 36 &amp; 37. KPMG is currently reviewing a closure statement internally for Exception 14.</li> </ul>	<ul style="list-style-type: none"> <li>The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>.</li> </ul>	<ul style="list-style-type: none"> <li>All exceptions must be closed for purposes of the test before reports can be finalized.</li> </ul>
IV-2	ECTA functional testing	<ul style="list-style-type: none"> <li>KPMG issued the following exceptions related to ECTA functional testing which remain open: Exceptions 12, 15, 81 &amp; 85. KPMG is awaiting GPSC comment on a closure statement for Exception 15.</li> </ul>	<ul style="list-style-type: none"> <li>The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>.</li> </ul>	<ul style="list-style-type: none"> <li>All exceptions must be closed for purposes of the test before reports can be finalized.</li> </ul>
IV-3	ODUF/ADUF usage functional test	<ul style="list-style-type: none"> <li>KPMG issued the following exceptions related to ODUF/ADUF usage functional testing that remain open: Exception 27, 28 &amp; 29. Additionally, KPMG has submitted one draft exception to BLS that will be publicly issued if the information is substantiated by the BLS response.</li> </ul>	<ul style="list-style-type: none"> <li>The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>.</li> </ul>	<ul style="list-style-type: none"> <li>All exceptions must be closed for purposes of the test before reports can be finalized.</li> </ul>
		<ul style="list-style-type: none"> <li>KPMG conducted a UNE DUF re-test on April 24, 2000.</li> </ul>	<ul style="list-style-type: none"> <li>This re-test was conducted in order to further test issues identified through initial test execution. Initial test results may have been negatively impacted by order-related problems.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG began analysis of the test results on May 10, 2000. The analysis is ongoing.</li> </ul>
		<ul style="list-style-type: none"> <li>KPMG is analyzing the results of the UNE DUF re-test.</li> </ul>	<ul style="list-style-type: none"> <li>None</li> </ul>	<ul style="list-style-type: none"> <li>KPMG expects to report on its analysis of the results of the re-test on June 12.</li> </ul>
IV-4	CRIS/CABS invoicing documentation evaluation	<ul style="list-style-type: none"> <li>KPMG issued the following exception related to CRIS/CABS invoicing documentation testing that remains open: Exception 73.</li> </ul>	<ul style="list-style-type: none"> <li>The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>.</li> </ul>	<ul style="list-style-type: none"> <li>All exceptions must be closed for purposes of the test before reports can be finalized.</li> </ul>
		<ul style="list-style-type: none"> <li>KPMG is awaiting responses from BLS to outstanding exceptions.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>Upon notification from BLS that implementation of solutions to all process deficiencies has been completed, KPMG will schedule a re-test.</li> </ul>



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		<ul style="list-style-type: none"> <li>KPMG has issued Exception 73, which details the deficiencies in BLS's CRIS/CABS, documentation.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>Upon notification from BLS that implementation of solutions to all process deficiencies has been completed, KPMG will schedule a re-test.</li> </ul>
V-2	Provisioning Verification	<ul style="list-style-type: none"> <li>KPMG issued the following exceptions related to Provisioning Verification that remain open: 58, 76, &amp; 82.</li> </ul>	<ul style="list-style-type: none"> <li>The status of exceptions and draft exception is detailed in <i>Section 6.0 Exceptions Status</i>.</li> </ul>	<ul style="list-style-type: none"> <li>All exceptions must be closed for purposes of the test before reports can be finalized.</li> </ul>
		<ul style="list-style-type: none"> <li>KPMG is concluding provisioning verification of "hot cuts" of actual CLEC customer accounts through the week of June 16<sup>th</sup>, 2000.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>Finalize analysis based on "hot cuts" observed.</li> </ul>
		<ul style="list-style-type: none"> <li>KPMG is concluding analysis of switch translations and CSRs for accounts that have completed during transaction testing of TAG and EDI functional evaluation. Provisioning errors appear to exist based on all three methods of evaluation. A revised data set for Exception 76 is being issued.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG has uncovered deficiencies in the following areas: 1) Validation of switch translations 2) Directory Assistance 3) CSR validation</li> </ul>	<ul style="list-style-type: none"> <li>Finalize analysis based on verified PONs (pending completion of PONs through pre-order and order evaluation) with BLS.</li> </ul>
V-3	Pre-ordering, Ordering and Provisioning Documentation Review	<ul style="list-style-type: none"> <li>KPMG issued the following exceptions related to Pre-Ordering, Ordering and Provisioning Documentation Reviews that remain open: Exception 33, 53, 55, 59, 63, 71 &amp; 75.</li> </ul>	<ul style="list-style-type: none"> <li>The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>.</li> </ul>	<ul style="list-style-type: none"> <li>All exceptions must be closed for purposes of the test before reports can be finalized.</li> </ul>
		<ul style="list-style-type: none"> <li>As of April 28, 2000, BLS indicated that all issues on KPMG's <i>Documentation Issues Report</i> were forecasted for closure in the next releases of the <i>Local Exchange Ordering (LEO) Guide, Volume 1</i>, the <i>Products and Services Interval Guide</i> and the <i>Pre-Order Business Rules</i>, respectively. KPMG is currently evaluating the <i>Pre-Order Business Rules</i>, updated on June 5.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG will work with BLS to identify and resolve outstanding documentation deficiencies.</li> </ul>
		<ul style="list-style-type: none"> <li>KPMG has conducted and documented two additional BLS interviews related to Pre-Order Business Rules and Resale.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG will compose and submit Interview Reports.</li> </ul>



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	<p><i>Local Exchange Ordering (LEO) Guide Volume 1 – Documentation Issues</i></p>	<ul style="list-style-type: none"> <li>Data Element Definition: <i>Account Name, Account Telephone Number</i></li> </ul>	<ul style="list-style-type: none"> <li>Errors were received on orders submitted following the conditional rules outlined in the documentation. Based on a call to BLS's Help Desk, ATN and EATN fields are required for LNP Full Migration with DL.</li> </ul>	<ul style="list-style-type: none"> <li>BLS has committed to updating the LEO Volume 1 in version 7Q to be released June 13, 2000.</li> </ul>
<ul style="list-style-type: none"> <li>Data Element Definition: <i>Billing Account Number1, Billing Account Number2, Billing Indicator1, Billing Indicator2</i></li> </ul>		<ul style="list-style-type: none"> <li>The documentation does not state: 1) when more than one BAN is required for an account type 2) the BAN sequence when more than one BAN is to be used.</li> </ul>	<ul style="list-style-type: none"> <li>BLS has committed to updating the LEO Volume 1 with appropriate BAN 1 and BAN 2 usage in the 7Q release June 13, 2000.</li> </ul>	
Data Definition: <i>Reference Number</i>		<ul style="list-style-type: none"> <li>BLS documentation does not define REFNUM requirements or ordering form requirements for multiple directory listings.</li> </ul>	<ul style="list-style-type: none"> <li>BLS has committed to updating the LEO Volume 1 in version 7Q to be released June 13, 2000.</li> </ul>	
Revision Issue: <i>Ordering Matrix</i>		<ul style="list-style-type: none"> <li>The ordering matrix does not define which complex orders can be submitted electronically.</li> </ul>	<ul style="list-style-type: none"> <li>BLS has committed to updating the LEO Volume 1 in version 7Q to be released June 13, 2000.</li> </ul>	
<ul style="list-style-type: none"> <li>Revision Issue: <i>D/SENTx</i></li> </ul>		<ul style="list-style-type: none"> <li>Revision Table identifies Section 4.3.1.8 as D/SENT however D/SENT is not in Section 4.3.1.8 but is in Section 4.3.1.9.</li> </ul>	<ul style="list-style-type: none"> <li>BLS has committed to updating the LEO Volume 1 in version 7Q to be released June 13, 2000.</li> </ul>	
<ul style="list-style-type: none"> <li>Data Definition: <i>DL</i></li> </ul>		<ul style="list-style-type: none"> <li>Documentation does not indicate additional RS forms are needed for multi DLs.</li> </ul>	<ul style="list-style-type: none"> <li>BLS has committed to updating the LEO Volume 1 in version 7Q to be released June 13, 2000.</li> </ul>	
<ul style="list-style-type: none"> <li>Data Definition: <i>REQ A/ACT T</i></li> </ul>		<ul style="list-style-type: none"> <li>Post-Migration outside move with TN change (ReqTyp/Act=A/T) submitted with 10 digit new TN as LOCBAN. Per BLS, the LOCBAN should be a CRIS Miscellaneous Account Number. LEO Guide, 7P, page 166, however, states that for non-designed Loops with ACT=A only, the LOCBAN must be a CRIS Miscellaneous Account Number.</li> </ul>	<ul style="list-style-type: none"> <li>BLS has committed to updating the LEO Volume 1 in version 7Q to be released June 13, 2000.</li> </ul>	
<ul style="list-style-type: none"> <li>Data Definition: <i>TER</i></li> </ul>		<ul style="list-style-type: none"> <li>A Resale LSR for PBX Service was submitted with TER (Terminal number) data as a 1 numeric character. BLS returned an error that TER must be 4 numeric characters. LEO Guide Vol 1, however, states that TER is "Up to 4 numeric characters" (See LEO Guide Vol 1, Issue 7P, page 191).</li> </ul>	<ul style="list-style-type: none"> <li>BLS has committed to updating the LEO Volume 1 in version 7Q to be released June 13, 2000.</li> </ul>	
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Ref <sup>1</sup>	Item	Status	Issues	Next Step/Resolution
	<i>Product and Services Interval Guide – Documentation Issues</i>	<ul style="list-style-type: none"> <li>Data Definition: <i>Dispatch</i></li> </ul>	<ul style="list-style-type: none"> <li>BLS documentation does not contain definitions for order types requiring dispatch. Several ordering intervals (as defined in the <i>Product and Service Interval Guide</i>) are different based on whether an order requires a dispatch. The definition of what does and does not require dispatch needs to be documented for CLECs.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG expects BLS to define <i>Dispatch</i> in the next quarterly update of the <i>Products and Service Interval Guide</i>.</li> </ul>
	<i>Pre-Order Business Rules</i>	<ul style="list-style-type: none"> <li>Revision Issue: <i>Page Numbering</i></li> </ul>	<ul style="list-style-type: none"> <li>BLS's <i>Pre-Order Business Rules, Issue 4</i> omits page numbers.</li> </ul>	<ul style="list-style-type: none"> <li>BLS has committed to insert page numbers in the next revision of the <i>Pre-Order Business Rules</i>, scheduled for release on June 16, 2000.</li> </ul>
V-4	ODUF/ADUF Documentation Evaluation	<ul style="list-style-type: none"> <li>KPMG issued the following exception related to ODUF/ADUF documentation that remains open: Exception 34.</li> <li>KPMG reviewed BLS's revisions to ODUF/ADUF documentation.</li> <li>BLS amended the ODUF/ADUF documentation on June 1.</li> </ul>	<ul style="list-style-type: none"> <li>The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>.</li> <li>KPMG is awaiting further revisions to the documentation.</li> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>All exceptions must be closed for purposes of the test before reports can be finalized.</li> <li>KPMG will review the amended documentation upon receipt from BLS.</li> <li>KPMG is reviewing the amended documentation for accuracy and completeness.</li> </ul>

**5.0 Supplemental Test Plan Specific Item Status**

Ref <sup>1</sup>	Item	Status	Issues	Next Step/Resolution
VII-2	Test Bed Development	<ul style="list-style-type: none"> <li>Provisioning and validation of the resale test bed is 100% complete.</li> <li>Provisioning and validation of the xDSL test bed is approximately 60% complete.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> <li>KPMG submitted two draft exceptions to BLS regarding the absence of guidelines for submitting xDSL Service Inquiries (SIs). KPMG must submit SIs in order for BLS to correctly provision the test bed.</li> </ul>	<ul style="list-style-type: none"> <li>N/A.</li> <li>BLS will address the documentation issue and provision the remaining xDSL accounts.</li> </ul>



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Ref <sup>1</sup>	Item	Status	Issues	Next Step/Resolution
VII-3	Detailed Test Plan Development	<ul style="list-style-type: none"> <li>KPMG has completed TAFI Functional Resale Line testing. Analysis and final report writing are currently underway.</li> </ul>	<ul style="list-style-type: none"> <li>None</li> </ul>	<ul style="list-style-type: none"> <li>N/A.</li> </ul>
		<ul style="list-style-type: none"> <li>KPMG is currently conducting testing of Resale Lines through the ECTA interface and is approximately 85% complete.</li> </ul>	<ul style="list-style-type: none"> <li>The team is still awaiting the provisioning of Synchronet Lines for the testbed.</li> </ul>	<ul style="list-style-type: none"> <li>BellSouth is currently in the process of provisioning these lines.</li> </ul>
		<ul style="list-style-type: none"> <li>KPMG is planning to conduct fault insertion testing on xDSL capable UNE loops during the week of 6/12/00.</li> </ul>	<ul style="list-style-type: none"> <li>The team is still awaiting the provisioning of xDSL lines for the testbed.</li> </ul>	<ul style="list-style-type: none"> <li>BellSouth is currently in the process of provisioning these lines. Availability is expected during the week of 6/12/00.</li> </ul>
VII-4	Metrics	<ul style="list-style-type: none"> <li>KPMG has completed calculations of SQM values of PMAP-generated and manually-generated SQMs for the CLEC aggregate and BellSouth retail.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG has found some apparent discrepancies between the values KPMG calculated and values reported by BLS.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG has issued Draft Exceptions and Exceptions outlining the issues.</li> </ul>
	PMR1 – Data Collection and Storage Verification and Validation Review	<ul style="list-style-type: none"> <li>KPMG reviewed the data flow process through legacy/source, PMAP, and other related BLS systems.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG is investigating some potential issues.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG expects to submit draft exceptions to BLS as appropriate.</li> </ul>
	PMR2 – Metrics Definition Documentation and Implementation Verification Review	<ul style="list-style-type: none"> <li>KPMG reviewed the definitions of PMAP-generated and manually-generated SQMs.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG is investigating some potential issues.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG expects to submit draft exceptions to BLS, as appropriate.</li> </ul>
	PMR3 – Metrics Change Management Verification and Validation Review	<ul style="list-style-type: none"> <li>KPMG began metrics change management testing activities.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG is investigating some potential issues.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG expects to submit draft exceptions to BLS as appropriate.</li> </ul>
	PMR4 – Metrics Data Integrity Verification and Validation Review	<ul style="list-style-type: none"> <li>KPMG compared data in the early stages of processing to raw data (data used for replication purposes).</li> </ul>	<ul style="list-style-type: none"> <li>KPMG is investigating potential issues.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG expects to submit draft exceptions to BLS as appropriate.</li> </ul>
	PMR5 – Metrics Calculation and Reporting Verification and Validation Review	<ul style="list-style-type: none"> <li>KPMG completed calculations of PMAP-generated and manually-generated SQM values for the CLEC aggregate and BLS retail.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG is investigating some potential discrepancies between the values calculated by KPMG and the values reported by BLS.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG expects to submit draft exceptions to BLS as appropriate.</li> </ul>



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Ref <sup>1</sup>	Item	Status	Issues	Next Step/Resolution
IX-2	PO&P11 – EDI & TAG Resale Functional Evaluation	<ul style="list-style-type: none"> <li>BLS provided additional business rules to KPMG. KPMG has received the following pieces of documentation: 1) <i>Hunting Ordering Guidelines</i>; 2) <i>Synchronet Service Electronic Business Requirements</i>; 3) <i>Basic Rate ISDN Service Electronic Business Requirements</i>; 4) <i>PBX Service Electronic Business Requirements</i>.</li> </ul>	<ul style="list-style-type: none"> <li>According to BLS, these documents were published on the following dates: 1) <i>Hunting</i> – 5/8/00; 2) <i>Synchronet</i> – 5/1/00; 3) <i>ISDN BRI</i> – 5/5/00; <i>PBX</i> – 5/5/00. BellSouth has made the <i>Hunting</i> documentation publicly available in the <i>LEO Guide, Volume 2</i>.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG will evaluate the documentation.</li> </ul>
		<ul style="list-style-type: none"> <li>KPMG is performing a documentation review of the new ordering guidelines to determine whether they adequately define ordering requirements.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG's further activities will be based on its documentation review.</li> </ul>
IX-3	PO&P12 – xDSL Functional Evaluation	<ul style="list-style-type: none"> <li>KPMG issued the following exception related to xDSL testing that remains open: <i>Exception 80</i>.</li> </ul>	<ul style="list-style-type: none"> <li>The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>.</li> </ul>	<ul style="list-style-type: none"> <li>All exceptions must be closed for purposes of the test before reports can be finalized.</li> </ul>
		<ul style="list-style-type: none"> <li>KPMG submitted document and interview requests to BLS.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG will review documentation upon receipt and conduct interviews.</li> </ul>
IX-4	PO&P-14 - Resale and xDSL Documentation Evaluation	<ul style="list-style-type: none"> <li>KPMG reviewed BLS's xDSL documentation for structure and format.</li> </ul>	<ul style="list-style-type: none"> <li>xDSL documentation contains some minor structural and formatting inconsistencies.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG has identified these inconsistencies to BLS.</li> </ul>
		<ul style="list-style-type: none"> <li>KPMG conducted one interview and has scheduled a second interview with CLEC personnel regarding BLS's resale documentation.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG is evaluating the clarity, accuracy and availability of BLS's resale documentation from the CLEC perspective.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG will conduct and document the second CLEC interview.</li> </ul>
	PO&P15 – Work Center Capacity Management – xDSL	<ul style="list-style-type: none"> <li>KPMG reviewed documentation received to date.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG has not received feedback on center interview summaries and additional documentation requested from BLS on 5/25.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG will review additional documentation, upon receipt.</li> </ul>
		<ul style="list-style-type: none"> <li>KPMG completed three additional work center visits and associated interviews.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG and BLS to schedule remaining center visits and interviews.</li> </ul>
	PO&P16 – xDSL Process Parity	<ul style="list-style-type: none"> <li>KPMG reviewed documentation received to date.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG has not received feedback on center interview summaries and additional documentation requested from BLS on 5/25/00.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG will review additional documentation, upon receipt.</li> </ul>
		<ul style="list-style-type: none"> <li>KPMG completed five additional work center visits and associated interviews.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG and BLS continue to schedule remaining center visits and interviews.</li> </ul>
IX-7	M&R12 – TAFI Functional Test of Resale Lines	<ul style="list-style-type: none"> <li>KPMG has completed approximately 90% of TAFI Functional Resale Line testing.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG will complete its analysis and draft a report.</li> </ul>

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Ref <sup>1</sup>	Item	Status	Issues	Next Step/Resolution
IX-8	M&R13 – ECTA Functional Test of Resale Lines	<ul style="list-style-type: none"> <li>The ECTA Functional Test of Resale Lines is approximately 75% complete.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG is awaiting provisioning of Synchronet lines for the test bed.</li> </ul>	<ul style="list-style-type: none"> <li>BLS is provisioning these lines.</li> </ul>
IX-9	BLG7 – CRIS Resale Invoicing Functional Evaluation	<ul style="list-style-type: none"> <li>KPMG is validating Resale bills for electronically orderable products and services.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG will complete validation activities and document its findings.</li> </ul>
		<ul style="list-style-type: none"> <li>KPMG continues to validate resale bills.</li> </ul>	<ul style="list-style-type: none"> <li>Due to a software defect, BLS is unable to support orders for change of telephone numbers on a measured rate lines. A solution is not expected before August. KPMG is unable to validate billing for this product.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG expects to complete validation by June 30, 2000.</li> </ul>
IX-10	BLG8 – Resale Usage Functional Evaluation	<ul style="list-style-type: none"> <li>KPMG placed test calls for BLG8 – Resale Usage Functional Evaluation during the week of April 3, 2000.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>Analysis of test results began on May 1, 2000.</li> </ul>
		<ul style="list-style-type: none"> <li>KPMG has completed its analysis of the results of the Resale DUF test.</li> </ul>	<ul style="list-style-type: none"> <li>A Draft Exception has been issued. KPMG is waiting for a response the Draft Exception from BLS.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG will review BLS's response when it is received and respond accordingly.</li> </ul>
IX-11	CM2 – OSS '99 Release Evaluation	<ul style="list-style-type: none"> <li>KPMG has completed initial testing activities associated with CM2, including interviews with BLS OSS '99 release personnel and documentation reviews.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG issued Observation 50 on 6/1/00 regarding potential issues with the adequacy of BLS's carrier-to-carrier test environment.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG is awaiting BLS responses to Observation 50 and related follow-up documentation request letter sent to BLS on 5/15/00.</li> </ul>

## 6.0 Exceptions<sup>2</sup> Status

Ref <sup>1</sup>	Item	Status	Issues	Next Step/Resolution
IV-5	Exceptions	<ul style="list-style-type: none"> <li>To address the issues raised in Exception 1, regarding Pre-ordering, BLS posted new pre-order business rules to its Interconnection Services Web site on June 5, 2000.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG indicated that BLS does not currently provide comprehensive and usable business rule documentation for submitting electronic pre-order transactions via the TAG interface.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG further actions are based on the outcome of its review of these pre-order business rules.</li> </ul>
		<ul style="list-style-type: none"> <li>KPMG is reviewing a closure statement for Exception 2, regarding Change Management, internally.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG indicated that BLS's change management process does not include clearly defined and reasonable intervals for notifying customers about changes to electronic interfaces and supporting documentation.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG expects to forward this closure statement to the GPSC for review and comment shortly.</li> </ul>



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Ref <sup>1</sup>	Item	Status	Issues	Next Step/Resolution
		<ul style="list-style-type: none"> <li>KPMG submitted a second closure statement for Exception 3, regarding Metrics, to the GPSC.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG indicated that CLECs are not notified when BLS initiates changes to published historical performance measurement reports and/or raw data files associated with these reports after this information has been removed from the PMAP web site.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG is awaiting comments from the GPSC on this closure statement.</li> </ul>
		<ul style="list-style-type: none"> <li>KPMG modified its closure statement for Exception 4, regarding Ordering and Provisioning, based on comments from the GPSC. KPMG re-submitted this closure statement to the GPSC for additional review and comment.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG indicated that TAG and EDI do not provide the functionality required for submitting partial migration service requests for loop-port combinations.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG is awaiting additional comments from the GPSC on this closure statement.</li> </ul>
		<ul style="list-style-type: none"> <li>As part of re-testing activities for Exception 9, regarding Ordering and Provisioning, KPMG is monitoring the remaining UNE and Resale orders to track missing electronic responses.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG indicated that BellSouth failed to deliver Firm Order Confirmations (FOCs) and Completion Notices (CNs) in response to electronic service order requests.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG's further actions will be based on the results of these re-testing activities.</li> </ul>
		<ul style="list-style-type: none"> <li>KPMG filed a closure statement for Exception 10, regarding Maintenance and Repair, with the GPSC on 6/02/00. KPMG performed re-testing activities upon the release of updated TAFI documentation on 4/07/00. KPMG noted that BLS's updates to the <i>CLEC TAFI End-User Training and User Guide</i> regarding subsequent and multiple trouble reports adequately address all the issues raised in Exception 10. This exception is closed.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG indicated that under two circumstances, a TAFI tester was unable to cancel or close a trouble report in the manner described in the <i>CLEC TAFI End-User Training and User Guide</i>.</li> </ul>	<ul style="list-style-type: none"> <li>N/A.</li> </ul>
		<ul style="list-style-type: none"> <li>KPMG expects to perform re-testing activities for Exception 12, regarding Maintenance and Repair, subsequent to the 6/19/00 scheduled release of ECTA.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG indicated that the ECTA Gateway does not accurately notify CLECs when invalid information is entered into a trouble ticket.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG's further actions will be based on the results of these re-testing activities.</li> </ul>
		<ul style="list-style-type: none"> <li>KPMG expects to perform re-testing activities for Exception 13, regarding Maintenance and Repair, subsequent to the next production release of TAFI, scheduled for 6/12/00.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG indicated that numerous undocumented messages intended for BellSouth are generated by TAFI during trouble report creation and processing.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG's further actions will be based on the results of these re-testing activities.</li> </ul>



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Ref <sup>1</sup>	Item	Status	Issues	Next Step/Resolution
		<ul style="list-style-type: none"> <li>KPMG modified its closure statement for Exception 14, regarding Maintenance &amp; Repair, based on comments from the GPSC. KPMG is currently reviewing this closure statement internally.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG indicated that BLS TAFI applications do not allow CLECs to process trouble reports for ISDN lines as described in the <i>CLEC TAFI End-User Training and User Guide</i>.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG expects to re-submit this closure statement to the GPSC in the near future.</li> </ul>
		<ul style="list-style-type: none"> <li>KPMG modified its closure statement for Exception 15, regarding Maintenance &amp; Repair, based on comments from the GPSC. KPMG re-submitted this closure statement to the GPSC.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG indicated that under certain circumstances, BellSouth's ECTA gateway cannot adequately create trouble tickets.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG is awaiting additional comments from the GPSC.</li> </ul>
		<ul style="list-style-type: none"> <li>KPMG is awaiting BLS's second amended response to Exception 16, regarding Billing.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG indicated that BellSouth issued multiple bills containing erroneous information to KPMG.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG's further actions are contingent upon the receipt BellSouth's second amended response.</li> </ul>
		<ul style="list-style-type: none"> <li>BLS submitted revised documentation to KPMG as part of a proposed resolution for Exception 17, regarding Change Management. KPMG is currently reviewing this documentation.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG indicated that BLS's change management process for updating the Interconnection Services Local Exchange Carriers – OSS Information Center Web site allows for defects in postings.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG's further actions will be based on its review of the submitted documentation.</li> </ul>
		<ul style="list-style-type: none"> <li>KPMG expects BLS to propose a feature implementation to address Exception 18, regarding Ordering and Provisioning.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG indicated that BLS's requirements for values entered in the Line Class of Service data element for EDI and TAG are not consistent, and the documentation is incomplete.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG will monitor the results of the CLEC Change Control prioritization and implementation process.</li> </ul>
		<ul style="list-style-type: none"> <li>KPMG received comments on its closure statement for Exception 19, regarding Metrics, from the GPSC. KPMG is currently evaluating the GPSC's comments.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG indicated that BLS does not adequately document changes in versions of the BLS Service Quality Measurements Performance Reports.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG expects to modify its closure statement, as necessary, based on the GPSC's comments.</li> </ul>
		<ul style="list-style-type: none"> <li>KPMG is reviewing a closure statement for Exception 21, regarding Flow-Through, internally.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG indicated that Local Service Requests (LSRs) were improperly categorized for <i>Percent Flow Through Service Request Reports</i>.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG expects to submit this closure statement to the GPSC for review and comment shortly.</li> </ul>
		<ul style="list-style-type: none"> <li>KPMG continues to execute re-testing activities for Exception 22, regarding Ordering &amp; Provisioning.</li> </ul>	<ul style="list-style-type: none"> <li>KPMG indicated that BLS disconnected retail accounts on loop migration orders without re-connecting the UNE loop component.</li> </ul>	<ul style="list-style-type: none"> <li>As part of re-testing activities, KPMG will continue to monitor performance of the remaining UNE and Resale orders.</li> </ul>